

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,

Civil Action No. 2:22-cv-547(MJH)

Plaintiff,

The Honorable Marilyn J. Horan

vs.

MICHAEL RUSSIN, RUSSIN FINANCIAL,
RUSSIN GROUP, SIMON ARIAS, III,
ARIAS AGENCIES, S.A. ARIAS
HOLDINGS, LLC, AMERICAN INCOME
LIFE INSURANCE COMPANY,

ELECTRONICALLY FILED

Defendants.

**DECLARATION OF JEFFREY M. HAMMER IN SUPPORT OF
AMERICAN INCOME LIFE INSURANCE COMPANY'S OPPOSITION
TO PLAINTIFF'S F.R.C.P. 60(b) MOTION FOR RELIEF FROM ORDER OF COURT
AND TO STAY ARBITRATION**

JEFFREY M. HAMMER, under the pains and penalties of perjury, states:

1. I am an attorney admitted to practice law in the State of California. I am a partner at King & Spalding LLP, counsel for Defendant American Income Life Insurance Company (“AIL”). I submit this declaration in support of AIL’s Opposition to Plaintiff Renee Zinsky’s (“Plaintiff”) F.R.C.P. 60(b) Motion for Relief from Order of Court and to Stay Arbitration. I have personal knowledge of the facts stated herein and could and would testify competently thereto under oath if called as a witness in this matter.

2. On September 27, 2022, Plaintiff initiated arbitration against AIL before the American Arbitration Association (“AAA”).

3. AAA appointed a three-arbitrator panel (“Panel”) to oversee that arbitration, consisting of Carole Katz (Chair), Melvin L. Vatz, and Stephen H. Jordan.

4. On December 6, 2023, Plaintiff moved the Panel to stay the arbitration based on the same two Notices of Intent to Reconsider (Dkt Nos. 111-1, 111-2) that Plaintiff relies on in her Motion to Stay filed with this Court.

5. On December 19, 2023, the Panel denied Plaintiff’s Motion to Stay. Attached hereto as **Exhibit A** is a true and correct copy of the Panel’s order.

6. Attached hereto as **Exhibit B** are true and correct copies of relevant portions of Plaintiff’s August 29, 2023 deposition transcript taken in connection with the arbitration.

7. Exhibits A and B are subject to the protective order in the arbitration but are attached hereto with the Panel’s permission.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This declaration was signed on February 1, 2024 in Los Angeles, California.

/s/Jeffrey M. Hammer
Jeffrey M. Hammer